

Gorenflo, Louise
Crossville, TN
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185 Hood Drive
Crossville, TN. 38555

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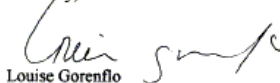
Dear Mr. Hartman:

I have the following problems with the Y-12 EIS:

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|--|-----------------|
| * There is no "need" - politically, strategically, or militarily - for new bomb manufacturing operations. The Y-12 EIS is premised on obsolete program objectives. | 1/16 |
| * The Y-12 EIS violates US nonproliferation goals. | |
| * The baseline for assessing the environmental impacts of Y12 must incorporate the historic contamination which makes Y-12 an EPA Superfund site. In periods of heavy rainfall, mercury releases from Y-12 exceed legal limits whether the plant is operating or not. | 2/12 |
| * The claims made in the Y-12 EIS about safety in the workplace fly in the face of historic and current management practice and are simply not credible. Risk scenarios based on safety claims cannot be believed. | 3/14 |
| * The Y-12 EIS should address the larger economic questions surrounding the trade-offs required for an investment of \$4 billion in a new bomb plant. | 1/16
(cont.) |
| * Although the Y-12 EIS states that there are no environmental justice concerns related to DOE's plans, Scarboro, a largely African-American community located less than one mile from the proposed site, will be the first and most heavily impacted by all contamination. High levels of contamination already exists in this community. | 4/13 |

For these and other reasons, I oppose the DOE's proposed Y-12 project.

Sincerely,


Louise Gorenflo

Comment No. 1

Issue Code: 16

There is no plan or proposal in the Y-12 SWEIS to build more nuclear weapons or to increase the Nation's nuclear weapon stockpile.

Parties to the Nuclear Nonproliferation Treaty agree not to directly or indirectly transfer nuclear weapons or other nuclear explosive devices or control over them to any recipient; and not to in any way assist, encourage, or induce nonnuclear weapon states to manufacture or alter use, or acquire nuclear weapons, or alter nuclear explosive devices or control over them. Continuation of the Y-12 mission, and construction and operation of a HEU Materials Facility or Special Materials Complex by the United States does not conflict with such an agreement. The proposed action, which includes continuing weapons dismantlement activities at Y-12, fully supports the goals of Article VI of the Nuclear Nonproliferation Treaty, in which signatory nations agree to work toward total disarmament. Since the end of the Cold War, the United States has significantly reduced the size of the nuclear weapons stockpile, and DOE has dismantled more than 15,000 nuclear weapons. At the present time, the United States is further downsizing the nuclear weapons stockpile consistent with the terms of the START I and the recently ratified START II. Although Russia suspended its nuclear weapons dismantlement activities on January 20, 2001, DOE has continued its weapons dismantlement activities.

DOE is responsible for meeting the current requirements set forth by the President and Congress in the Nuclear Weapons Stockpile Memorandum, which is updated annually. The need for nuclear weapons and alternative uses of the Nation's funds are beyond the scope of the Y-12 SWEIS.

Comment No. 2

Issue Code: 12

DOE believes that it has adequately addressed impacts to the environment that could result from implementing the various alternatives. Historic contamination at Y-12 is discussed in Sections 4.5.1, 4.5.2, and 4.5.3, which detail the surface and groundwater impacts. The effects due to the past releases including mercury are

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Comment No. 2 (cont.)

Issue Code: 12

reflected in Chapter 4 (Affected Environment), and in the No Action - Status Quo Alternative. Environmental and public health affects from Y-12 past and current operations can also be reviewed in the ORR Annual Site Environmental Report. The release of mercury from Y-12 storm sewers has been a problem during heavy rainfall events. However, corrective actions such as storm sewer cleaning and relining and mercury source removals conducted since 1985 have greatly reduced releases of mercury from former mercury-use facilities. In addition, the Y-12 National Security Complex has an Integrated Mercury Strategy Program to achieve compliance with regulations and guidance addressing mercury contamination at EFPC.

Comment No. 3

Issue Code: 14

DOE believes that it has adequately addressed impacts to public health and safety that could result from implementing the various alternatives. Volume I, Chapter 5, Section 5.12 of the Y-12 SWEIS addresses impacts to public health and safety from the proposed alternatives, and Volume II, Appendices D and E provide further detailed analyses related to human health effects from normal operations/facility accidents and air quality, respectively. Appendix A discusses the actions taken at specific facilities at Y-12 in response to fire and worker safety issues. Worker safety is always the first priority at Y-12. (Also see response to Comment No. 26 on page 217).

Comment No. 4

Issue Code: 13

DOE is committed to compliance with provisions of Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. The environmental justice analysis was prepared in accordance with CEQ's guidelines for environmental justice under NEPA. The Y-12 SWEIS addresses the issue of whether implementation of the proposed action or alternatives would result in disproportionately high and adverse environmental effects on minority or low-income populations. CEQ's guidance further states that an environmental effect must be significant to

Comment No. 4 (cont.)

Issue Code: 13

qualify as disproportionately high and adverse, where significant is defined by the CEQ's implementation recommendations (see 40 CFR Part 1508.27). As discussed in Volume I, Chapter 5 of the Y-12 SWEIS, implementation of the alternatives for the continuation of the Y-12's weapons support mission, and the construction and operation of new facilities for the HEU Storage and Special Materials missions at Y-12 would pose no significant health risks to the public. (Also see response to Comment No. 20 concerning the Scarboro Community on page 212).